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Detox LLC, Ocean Valley Behavioral Health,
LLC, Rodeo Recovery LLC, Sunset Rehab
LLC, Natural Rest House, Inc., 55 Silver LLC,
and 9 Silver LLC

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

AETNA LIFE INSURANCE COMPANY,
AETNA HEALTH OF CALIFORNIA,
INC.,

Plaintiffs,

v.

NATHAN SAMUEL YOUNG a/k/a
PABLO LOPEZ; DAVID YOUNG a/k/a
SANCHO LOPEZ; JOSE RICARDO
TOSCANO MALDONADO; ALI
BEHESHTI; MARC ADLER; ANI
MIRZAVAN; ZEALIE LLC; HELPING
HANDS REHABILITATION CLINIC
INC; JOSER FOREVER LLC, GET
REAL RECOVERY LLC; REVIVE
PREMIER TREATMENT CENTER,
INC.; HEALING PATH DETOX LLC;
OCEAN VALLEY BEHAVIORAL
HEALTH, LLC; RODEO RECOVERY

Case No. 2:23-cv-09654-MCS-MCS

**DECLARATION OF MARC S.
WILLIAMS ACCOMPANYING
REQUEST FOR JUDICIAL NOTICE
AND/OR INCORPORATION BY
REFERENCE IN SUPPORT OF
YOUNG DEFENDANTS' MOTION TO
DISMISS FIRST AMENDED
COMPLAINT**

Judge: Hon. Marc C. Scarsi
Date: April 29, 2024
Time: 9:00 a.m.
Place: First Street Court House,
Courtroom 7C

Complaint Filed: November 14, 2023
Trial Date: Not Scheduled

1 LLC; SUNSET REHAB LLC;
2 NATURAL REST HOUSE, INC; 55
3 SILVER LLC, 9 SILVER LLC; JOHN
4 DOES 1 THROUGH 50, AND ABC
5 CORPS. 1-50,

Defendants.

COHEN WILLIAMS_{LLP}

DECLARATION OF MARC S. WILLIAMS

I, Marc S. Williams, declare as follows:

1. I am over the age of eighteen and am an attorney duly licensed to practice law in the State of California. I am a partner at Cohen Williams LLP and attorney of record for Defendants Nathan Young, David Young, Get Real Recovery LLC, Healing Path Detox LLC, Ocean Valley Behavioral Health, LLC, Rodeo Recovery LLC, Sunset Rehab LLC, Natural Rest House, Inc., 55 Silver LLC, and 9 Silver LLC in the above-captioned action.

2. I make this declaration to authenticate all but one of the documents attached to the Request for Judicial Notice and/or Incorporation by Reference in Support of Young Defendants' Motion to Dismiss First Amended Complaint (the "RJN"). This declaration is based upon my personal knowledge, unless otherwise stated, and on the files and records in this case. If called upon to testify as to the matters set forth in this declaration, I could and would do so.

3. Attached as Exhibit 1 to the RJN is a true and correct copy of the Criminal Complaint filed in *United States v. Moore*, United States District Court for the Central District of California, Case No. 8:21-cr-00079-JLS, filed on March 29, 2021, Document 1. I obtained this document from the hyperlink located in footnote 3 of the First Amended Complaint ("FAC") filed by Plaintiffs Aetna Life Insurance Company and Aetna Health of California, Inc. (collectively, "Aetna") in this action (ECF 39): <https://www.justice.gov/media/1152236/dl?inline>.

4. Attached as Exhibit 2 to the RJN is a true and correct copy of the Indictment filed in *United States v. Mahoney*, United States District Court for the Central District of California, Case No. 8:21-cr-00183-JLS, filed on October 6, 2021, Document 1. I obtained this document from the hyperlink located in footnote 6 of the FAC: <https://www.justice.gov/criminal-fraud/file/1564811/download>.

5. Attached as Exhibit 3 to the RJN is a true and correct copy of the First Amended Complaint, filed on May 18, 2020, in *City of Beverly Hills v. Rodeo Recovery*,

1 *LLC, et al.*, Los Angeles Superior Court, Case No. 20SMCV00704. I obtained this
2 document from the “Case Access” webpage of the Los Angeles Superior Court website.

3 6. Attached as Exhibit 4 to the RJN is a true and correct copy of the Joint Status
4 Report re Case Management Conference, filed on January 7, 2021, in *City of Beverly Hills*
5 *v. Rodeo Recovery, LLC, et al.*, Los Angeles Superior Court, Case No. 20SMCV00704. I
6 obtained this document from the “Case Access” webpage of the Los Angeles Superior
7 Court website.

8 7. Attached as Exhibit 5 to the RJN is a true and correct copy of the Minute
9 Order, filed on March 12, 2021, in *City of Beverly Hills v. Rodeo Recovery, LLC, et al.*,
10 Los Angeles Superior Court, Case No. 20SMCV00704. I obtained this document from the
11 “Case Access” webpage of the Los Angeles Superior Court website.

12 8. Attached as Exhibit 6 to the RJN is a true and correct copy of the Minute
13 Order, filed on May 11, 2021, in *City of Beverly Hills v. Rodeo Recovery, LLC, et al.*, Los
14 Angeles Superior Court, Case No. 20SMCV00704. I obtained this document from the
15 “Case Access” webpage of the Los Angeles Superior Court website.

16 9. Attached as Exhibit 7 to the RJN is a true and correct copy of the Joint
17 Stipulation and Order to Continue Hearing Re: OSC Re: Dismissal, filed on June 17, 2021,
18 in *City of Beverly Hills v. Rodeo Recovery, LLC, et al.*, Los Angeles Superior Court, Case
19 No. 20SMCV00704. I obtained this document from the “Case Access” webpage of the
20 Los Angeles Superior Court website.

21 10. Attached as Exhibit 8 to the RJN is a true and correct copy of the Joint
22 Stipulation and Order to Continue Hearing Re: OSC Re: Dismissal, filed on July 28, 2021,
23 in *City of Beverly Hills v. Rodeo Recovery, LLC, et al.*, Los Angeles Superior Court, Case
24 No. 20SMCV00704. I obtained this document from the “Case Access” webpage of the
25 Los Angeles Superior Court website.

26 11. Attached as Exhibit 9 to the RJN is a true and correct copy of Joint Stipulation
27 and Order to Continue Hearing Re: OSC Re: Dismissal, filed on September 16, 2021, in
28 *City of Beverly Hills v. Rodeo Recovery, LLC, et al.*, Los Angeles Superior Court, Case

No. 20SMCV00704. I obtained this document from the “Case Access” webpage of the Los Angeles Superior Court website.

12. Attached as Exhibit 10 to the RJN is a true and correct copy of the Minute Order, filed on October 28, 2021, in *City of Beverly Hills v. Rodeo Recovery, LLC, et al.*, Los Angeles Superior Court, Case No. 20SMCV00704. I obtained this document from the “Case Access” webpage of the Los Angeles Superior Court website.

13. Attached as Exhibit 11 to the RJN is a true and correct copy of the Minute Order, filed on December 13, 2021, in *City of Beverly Hills v. Rodeo Recovery, LLC, et al.*, Los Angeles Superior Court, Case No. 20SMCV00704. I obtained this document from the “Case Access” webpage of the Los Angeles Superior Court website.

14. Attached as Exhibit 12 to the RJN is a true and correct copy of the Minute Order, filed on January 27, 2022, in *City of Beverly Hills v. Rodeo Recovery, LLC, et al.*, Los Angeles Superior Court, Case No. 20SMCV00704. I obtained this document from the “Case Access” webpage of the Los Angeles Superior Court website.

15. Attached as Exhibit 13 to the RJN is a true and correct copy of the Minute Order, filed on March 29, 2022, in *City of Beverly Hills v. Rodeo Recovery, LLC, et al.*, Los Angeles Superior Court, Case No. 20SMCV00704. I obtained this document from the “Case Access” webpage of the Los Angeles Superior Court website.

16. Attached as Exhibit 14 to the RJN is a true and correct copy of the Request for Dismissal, filed on May 12, 2022, in *City of Beverly Hills v. Rodeo Recovery, LLC, et al.*, Los Angeles Superior Court, Case No. 20SMCV00704. I obtained this document from the “Case Access” webpage of the Los Angeles Superior Court website.

17. Attached as Exhibit 16 to the RJN is a true and correct copy of a printout from the Los Angeles Superior Court website of the docket in *City of Beverly Hills v. Rodeo Recovery, LLC, et al.*, Los Angeles Superior Court, Case No. 20SMCV00704. I printed the printout on March 24, 2024.

18. Attached as Exhibit 17 to the RJN is a true and correct copy of a printout of the following webpage from the CMS.gov website: <https://www.cms.gov/medicare/cms->

1 [forms/cms-forms/cms-forms-items/cms1188854](#). I printed the printout on March 24, 2024.
2 Included with Exhibit 17 is a true and correct copy of the sample CMS 1500 Claim Form
3 that I downloaded from this webpage on March 24, 2024.

4 19. Attached as Exhibit 18 to the RJN is a true and correct copy of the Publication
5 of OIG Special Fraud Alerts, 59 FR 65372-01, 1994 WL 702552(F.R.), dated December
6 19, 1994. I obtained a copy of this document from Westlaw, 1994 WL 702552.

7 I declare under penalty of perjury under the laws of the United States of America
8 that the foregoing is true and correct.

9 Executed on March 26, 2024, at Los Angeles, California.

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12 Bv: /s/ Marc S. Williams
13 Marc S. Williams
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